

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

No. 6:20-cv-00813-ADA

JURY TRIAL DEMANDED

**BRAZOS’S NOTICE OF FILING OF PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 7,483,998**

Pursuant to the Court’s Order Governing Proceedings – Patent Case (Dkt. 24), plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”), hereby provides the Court with notice that a petition for *inter partes* review (“IPR”) of the patent asserted in this case — U.S. Patent No. 7,483,998 (“the ’998 patent”) — has been filed:

IPR2021-00768

Petitioner:	Juniper Networks, Inc. (“Juniper”) (the defendant in this case)
Other Real Parties-in-Interest:	none
filing date:	April 5, 2021 (notice of filing date accorded not yet issued)
expected time for institution decision:	within 6 months of notification of filing date, <i>i.e.</i> , by about October 2021
expected time for final written decision:	within 1 year of institution, <i>i.e.</i> , by about October 2022

The claim construction hearing in this case is scheduled for June 3, 2021 and trial has been scheduled to begin on July 11, 2022. *See* Case No. 6:20-cv-00812, Dkt. 38.

Juniper has filed an opposed motion to transfer this case to the Northern District of California, Dkt. 18, relating to which the parties are conducting discovery pursuant to the Court’s

Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases. Brazos intends to file its opposition to this motion by April 23, 2021. Juniper has also filed an opposed motion to stay the proceedings of this case pending the resolution of its motion to transfer, Dkt. 34. *See also* Dkt. 36 (Brazos's opposition to Juniper's motion to stay); Dkt. 37 (Juniper's reply in support of motion to stay).

Respectfully submitted,

Dated: April 19, 2021

/s/ Raymond W. Mort, III

Raymond W. Mort, III
Texas State Bar No. 00791308
raymort@austinlaw.com
THE MORT LAW FIRM, PLLC
100 Congress Avenue, Suite 2000
Austin, Texas 78701
tel/fax: (512) 677-6825

David M. Stein
Texas State Bar No. 797494
dstein@brownrudnick.com
Sarah G. Hartman
California State Bar No. 281751
shartman@brownrudnick.com
BROWN RUDNICK LLP
2211 Michelson Drive, 7th Floor
Irvine, California 92612
telephone: (949) 752-7100
facsimile: (949) 252-1514

Edward J. Naughton
(admitted *pro hac vice*)
enaughton@brownrudnick.com
Rebecca MacDowell Lecaroz
(admitted *pro hac vice*)
rlecaroz@brownrudnick.com
BROWN RUDNICK LLP
One Financial Center
Boston, Massachusetts 02111
telephone: (617) 856-8200
facsimile: (617) 856-8201

Alessandra C. Messing
(admitted *pro hac vice*)

amessing@brownrudnick.com

Timothy J. Rousseau

(admitted *pro hac vice*)

trousseau@brownrudnick.com

Yarelyn Mena

(admitted *pro hac vice*)

ymena@brownrudnick.com

BROWN RUDNICK LLP

7 Times Square

New York, New York 10036

telephone: (212) 209-4800

facsimile: (212) 209-4801

Counsel for Plaintiff

WSOU Investments, LLC d/b/a

Brazos Licensing and Development